

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOCKET NUMBER: 04-10195

UNITED STATES OF AMERICA)
VS.)
MICHAEL PINA)

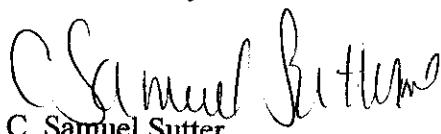
MOTION TO EXTEND TIME

Now comes the defendant, MICHAEL PINA, and hereby moves that this Honorable Court extend the time within which his attorney must file substantive motions from Friday, October 8, 2004 to Monday, November 8, 2004.

As grounds therefore the defendant states, that his attorney has had an extremely demanding trial and motion schedule for the past month. His attorney has had to prepare for Superior Court trials in the cases of: Commonwealth v Stephen Parker; Commonwealth v George Vanasse; and, Commonwealth v Steven Carvalho. As further grounds for this motion the defendant states that Assistant United States Attorney, Donald Cabell, assents to this request. And finally, the defendant agrees that the period of time from October 8, 2004 to November 8, 2004, should be excluded from the Speedy Trial provisions.

WHEREFORE, the defendant respectfully requests that this Honorable Court extend the deadline for the filing of substantive motions.

By his attorney,


C. Samuel Sutter
203 Plymouth Avenue, Bld. 7
Fall River, Ma 02721
Telephone: (508) 674-8633
Facsimile: (508) 673-3766
BBO 542496